REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-22 and 25-31 are pending in the application. Applicant thanks the Office for a detailed analysis presented in the Office Action.

As a preliminary matter, review of the Applicant's file in this matter indicates that a supplemental Information Disclosure Statement (IDS) was filed by the Applicant's previous counsel on or about 16 October 2003. This IDS listed U.S. Patent No. 5,701,451 to Rogers, et al. Apparently, the Rogers patent was cited during prosecution of a foreign counterpart to the instant application. In any event, it appears that the Applicant has not received an initialed PTO Form 1449 from the IDS filed on 16 October 2003. The Office is requested to check its file on this matter, and return an initiated copy of the PTO Form 1449 from the IDS filed on 16 October 2003 with the next communication in this matter.

Claim Rejections under 35 U.S.C. § 102

Feit

Claims 1, 2, 11, 12 and 17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2001/0056354 to Feit et al. (hereinafter, "Feit"). Applicant respectfully traverses the rejections.

Feit describes a system and methods for implementing a computerized service provider request service for delivering service requests for multiple subscriptions, goods, memberships, etc. to many service providers. The system includes a server computer hosting a service provider request service accessible via client systems to a plurality of clients and a plurality of service providers. The

Feit system also describes a database of information concerning the services

available from the service providers, who offer services to qualified clients. The

server provider request service also includes an integrated user interface

comprising controls whereby a client submits qualification information.

Furthermore, the service provider request service and the integrated user interface

are available via a communications network (e.g. the internet) to assist a client in

delivering service requests to the service providers. (*Feit*, abstract). Specifically,

Feit describes a system that enables a user to request multiply free magazine

subscriptions from multiple publishers (i.e. service providers), particularly when

the user must first qualify for the subscriptions. (*Feit*, p. 3, paragraph 36, lines

3-10).

Meanwhile, **independent claim 1** recites a distributed information

processing system, comprising (emphasis added):

a client device interface adapted to receive requests for *electronic information* from a plurality of remote devices;

a stateless module manager adapted to receive and route said requests from said client device interface; and

a plurality of information modules,

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wherein said information modules register with said stateless module manager and stateless module manager routes said request to an appropriate one of said plurality of information modules in accordance with a type of information requested.

In making out a rejection of claim 1, the Office states that "the rejection is set forth in First Office Action mailed 02/24/2005." (*Office Action of 08/25/05*, p. 2-3). In the previous Action, the Office rejects the claim in the following manner:

In referencing to claim 1, Feit discloses a distributed information processing system (fig. 1), comprising:

- a client device interface (fig. 2, #35, user interface form/HTML Form) adapted to receive requests for information from a plurality of remote devices (fig. 1, #12, Client Systems) (page 6, paragraph 52, lines 1-8, 11-14);

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- a module manager (fig. 1, #14, Server) adapted to receive and route

  said requests from said client device interface (page 6, paragraph 52,

  lines 14-16); and

- a plurality of information modules (fig. 1, #18, Service Providers),

  wherein said information modules register ("identify & communicate",

  page 5, paragraph 50, lines 1-6) with said module manager and

  module manager routes said request to an appropriate one of said

  plurality of information modules in accordance with a type of

  information requested (page 6, paragraph 52, lines 25-38)

(*Office Action of 08/25/05*, p. 4-5). Applicant respectfully submits that the rejection of claim 1 is improper because the cited reference does not disclose all of the elements of the claim.

More specifically, Feit does not disclose "a client device interface adapted to receive requests for *electronic information* from a plurality of remote devices" as recited in Applicant's claim 1. (emphasis added).

As described above, Feit describes a computerized service provider request service for delivering service requests from a client to a service provider. Feit, however, describes that these services requested by a client include **subscriptions, goods** and **memberships**, and more specifically Feit describes a system for requesting *free magazine subscriptions* to qualified clients. (*Feit*, abstract); *Feit*, Page 3, paragraph 36, lines 3-10).

For example, a client who wishes to use the Feit system begins by surfing to the appropriate website, such as the illustrated MyBizMags.com. Such a website "offers [the client] a way to save time by requesting subscriptions to all of

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your favorite publications without the need to fill out the redundant qualification forms". (*Feit*, p. 7, paragraphs 60-63). The system then displays an alphabetized list of magazine subscription categories that the client may select from (E.g. business and finance, construction, electronics, etc.). After selecting multiple magazine subscriptions that the client is interested in receiving, the client enters his or her personal information, such as his or her address among other things. The system then requires the client to answer questions relating to his or her "job function [that is] common to [the] magazines" selected by the client. (*Feit*, p. 7-8, paragraphs 64-128). After compiling all of the client's answers and all of the client's information, this data is compared with each magazine publisher's guidelines for providing free subscriptions, which are generally only provided to individuals who have a certain level of organizational seniority, work for a company of a certain size, or if they have certain product/service purchasing authority. If the client meets the publisher's criteria, then an email is sent directly to the publisher, who then will send the client the magazine subscription through the mail. (*Feit*, p. 8-9, paragraphs 129-184).

Therefore, Feit discloses a system and method whereby a client can request services such as free magazine subscriptions, memberships, services and other goods from a plurality of service providers. (*Feit*, abstract). Feit does not disclose "a client device interface adapted to receive requests for *electronic information* from a plurality of remote devices" as recited in Applicant's claim 1. (emphasis added)."

For at least this reason, Applicant submits that Feit fails to support a § 102 rejection of claim 1. Applicant therefore respectfully requests that the §102 rejection be withdrawn.

1   Furthermore, Applicant submits once more that Feit also fails to disclose "a

2   *stateless* module manager adapted to receive and route said requests from said

3   client device interface", as recited in claim 1 (emphasis added).

4   Despite Applicant's earlier arguments in response to the Office Action

5   dated February 24, 2005, the Office asserts that Feit "inherently teaches the

6   limitation of a stateless module manager." According to the Office, "[i]t was well

7   known by one of ordinary skill in the art that the HTTP protocol is a stateless

8   protocol. Every connection is negotiated from scratch and the server does not

9   maintain a session with the client and each HTTP exchange is a completely

10   independent event as the server does not save any information between client

11   exchanges." (*Office Action of 08/25/05*, p. 8).

12   Applicant, however, disagrees that Feit discloses a "stateless module

13   manager." While it is certainly true that the HTTP is a stateless *protocol*, the

14   element of Feit that is deemed by the Office as a "module manager" is not the

15   protocol used, but rather the *server system 14*. Applicant again submits that while

16   the widely used HTTP protocol may be stateless, this server system *is not*

17   stateless. As Applicant stated in response to the Office Action dated February 24,

18   2005, a stateless module manager "receives and routes requests without any prior

19   knowledge of the client sending the request, or without any knowledge of where

20   the request will be sent until it is actually received." Therefore, "the system

21   (claims 1, 2 and 11) and the methods therein (claims 12 and 17), treat each request

22   as an independent transaction, unrelated to any previous request." This is not true

23   of the Feit server system, as Applicant previously discussed:

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To the contrary, and as discussed during the Interview of April 20, 2005, Fiet et al. teach a server system 14 (asserted by the Examiner in the Office Action to be a module manager) that requires state information to create the single user interface (transmitted by the web server 80 to the client 12) from which data is communicated to the service providers 18. In particular, a first interface details a multiplicity of services from which the client is asked to select services they wish to receive (see, paragraphs [0052] and [0059]-[0099]). Next, the server system 14 aggregates and populates another user interface with all of the qualification requirement information from each of the individual service providers 18's *from which services are desired* (see, paragraphs [0052] and [0100]-[0162]). Thus, this interface depends on the selections made in the first interface. The client makes a request by submitting the qualification requirement information for analysis by the desired service providers (paragraph [0052] and [0163]-[0184]). As such, the server system 14 taught by Feit et al. uses state information to process client requests. Accordingly, Feit et al. fails to teach or render obvious the stateless module manager of the instant invention.

For at least this additional reason, Applicant submits that Feit fails to support a § 102 rejection of claim 1. Applicant therefore respectfully requests that the §102 rejection be withdrawn.

Dependent claims 11 and 12 depend from claim 1 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claim 1, define devices not disclosed by Feit.

Independent claim 12 recites a method of receiving and responding to requests for electronic information in a distributed information processing system, the method comprising:

receiving a request for electronic information at a client device interface;

forwarding said request to a stateless module manager;

consulting a registry of available information modules; and

forwarding said request to an appropriate information module
as determined in accordance with a type of information requested.

For the reasons given above with respect to claim 1, Feit does not disclose this method. Namely, the reference does not disclose "receiving a request for electronic information". Furthermore, Feit does not disclose "a stateless module manager". For at least these reasons, Feit does not support a § 102 rejection of claim 12. Applicant therefore respectfully requests that the §102 rejection be withdrawn.

Independent claim 17 recites a computer readable medium containing computer executable instructions for receiving and responding to requests for electronic information in a distributed information processing system, said computer executable instructions for performing the steps of:

receiving a request for electronic information at a client
device interface;

forwarding said request to a stateless module manager;

consulting a registry of available information modules; and

forwarding said request to an appropriate information module
as determined in accordance with a type of information requested.

For the reasons given above with respect to claim 1, Feit does not disclose this method. Namely, the reference does not disclose "receiving a request for electronic information". Furthermore, Feit does not disclose "a stateless module manager". For at least these reasons, Feit does not support a § 102 rejection of claim 12. Applicant therefore respectfully requests that the §102 rejection be withdrawn.

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Claim Rejections under 35 U.S.C. § 103

Feit in view of Rubert

Claims 3, 5, 6, 15, 16, 20 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of U.S. Patent No. 6,366,915 to Rubert et al. (hereinafter, "Rubert"). Applicant respectfully traverses the rejection.

In making out a rejection of **dependent claims 3, 5, 6, 15, 16, 20 and 21**, which all depend upon one of Applicant's independent claims 1, 12 or 17, the Office relies on the rejections of the base claims as discussed above.

Applicant submits, however, that Feit not only fails to disclose all of the elements of these base claims, as discussed above, but also teaches away from these elements. Therefore, Feit does not teach or suggest all of the elements of the base claims upon which claims 3, 5, 6, 15, 16, 20 and 21 rely upon.

Once more, claim 1 recites, in part, "receiving a request for *electronic* information". (emphasis added). Claims 12 and 17 similarly recite "receiving a request for *electronic* information." (emphasis added). Feit describes a system for delivering service requests from clients to service providers. Feit, however, teaches that the services requested are "subscriptions, goods, memberships" such as *free magazine subscriptions*. (*Feit*, abstract); (*Feit*, p. 3, paragraph 36, lines 3-10). Feit therefore teaches a service request system wherein the requested services are physical items, which must be *mailed to the client*. This is despite the fact that the Feit system can utilize the internet itself in making the initial request by the client. Applicant respectfully submits that a system which utilizes the internet for requesting physical items directly teaches away from a request for "*electronic* information". (emphasis added).

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Therefore, for the reasons given above with respect to claims 1, 12 and 17, Feit does not teach or suggest these claims. Namely, the reference does not teach or suggest receiving a request for or requesting "electronic information". Feit also does not teach or suggest "a stateless module manager" for the reasons discussed above. Furthermore, Rubert is not cited for teaching either of these limitations and is not seen to add anything of substance to the rejection. For at least these reasons, Feit and Rubert do not support a § 103 rejection of claims 3, 5, 6, 15, 16, 20 and 21, which depends upon claims 1, 12 and 17. Applicant therefore respectfully requests that the §103 rejection be withdrawn. Furthermore, claims 3, 5, 6, 15, 16, 20 and 21 recite features that, when taken together with those of their base claims, define devices methods not taught or suggested by Feit and/or Rubert.

For example, Applicant submits that the combination of the Feit and Rubert would also be improper in the rejection of **dependent claim 3**. Claim 3 recites "[t]he distributed information processing system as recited in claim 1, wherein the appropriate one of said plurality of information modules generates a response that is returned to said stateless module manager, and wherein said stateless module manager routes said response to said client interface device for delivery to a requestor." The Office then states that Feit "does not explicitly disclose that a response generated at the information module (service provider) is returned to the requestor (client) by the client device interface (user interface form/HTML form) via the module manager (server). Nonetheless, this feature would have been an obvious modification to the system disclosed by Feit as evidenced by Rubert." (*Office Action of 02/24/05*, p. 7).

Applicant respectfully disagrees, and submits that Feit also directly teaches away from such a modification, which would *frustrate Feit's intended purpose*.

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As discussed above, Feit's system is intended to "deliver[] service requests to many service providers", after which the *service provider* may then send the requested services *directly* to the client. Feit illustrates this process by describing a system where a client may request free magazine subscriptions, which are then sent to the client directly from the service provider if the client qualifies for the subscription. In fact, it would not even be possible for the service provider (i.e. magazine publisher) to send the physical product (i.e. magazine) to the server through the "communications network". Therefore, Feit teaches the service provider sending a response and not the server itself. As such, Feit teaches away from a system "wherein the appropriate one of said plurality of information modules generates a response that is returned to said stateless module manager, and wherein said stateless module manager routes said response to said client interface device for delivery to a requestor" as recited by Applicant's claim 3.

For at least this additional reason, Feit and Ruber do not support a § 103 rejection of claim 3. Applicant therefore respectfully requests that the §103 rejection be withdrawn.

Feit in view of Rubert in further view Hunt

Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Rubert in further view of U.S. Patent Publication No. 2002/0087657 to Hunt (hereinafter "Hunt"). Applicant respectfully traverses the rejection.

In making out a rejection of this claim, the Office relies upon the rejection of the base claim as described above. Neither Rubert nor Hunt teach or suggest the deficiencies of the rejection in relation to base claim 1, as described above, nor

are the references cited by the Office as doing so. Therefore, the addition of these references is not seen to add anything of substance to the rejection of these base claims.

Dependent claim 7 depends from claim 1 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to this claim. Moreover, this claim recites features that, when taken together with those of claim 1, define a device not taught or suggested by the cited references.

Feit in view of Strahm in further view of Langseth

Claims 8, 9 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of U.S. Patent Publication No. 2003/0046337 to Strahm et al. (hereinafter, "Strahm") in further view of U.S. Patent No. 6,741,980 to Langseth et al. (hereinafter, "Langseth"). Applicant respectfully traverses the rejection.

In making out a rejection of these claims, the Office relies upon the rejection of the base claim as described above. Neither Strahm nor Langseth teach or suggest the deficiencies of the rejection in relation to base claim 1, nor are the references cited by the Office as doing so. Therefore, the addition of these references is not seen to add anything of substance to the rejection of these base claims.

Dependent claims 8, 9, and 10 depend from claim 1 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claim 1, define devices not taught or suggested by the cited references.

Feit in view of Strahm

Claims 13 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Strahm. Applicant respectfully traverses the rejection.

In making out a rejection of these claims, the Office relies upon the rejection of the base claim as described above. Strahm does not teach or suggest the deficiencies of the rejection in relation to base claims 12 and 17, nor is it cited by the Office as doing so. Therefore, the addition of this reference is not seen to add anything of substance to the rejection of these base claims.

Dependent claims 13 and 18 depend from claims 12 and 17 and, by virtue of this dependency, the above comments directed to claims 12 and 17 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claims 12 and 17, define devices and methods not taught or suggested by the cited references.

Feit in view of Rubert in further view of Strahm

Claims 22, 30 and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Rubert in further view of Strahm. Applicant respectfully traverses the rejection.

Independent claim 22 recites a stateless module manager that manages requests for electronic information received at a mailbox, comprising:

"a registry of information modules;

a module loading function for dynamically loading said information modules upon receipt of said request for electronic information, wherein said request is made as one of a

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serializable Java object, XML placed in an HTTP header, or an XML-RPC-enabled web server, wherein said request is either synchronous or asynchronous, wherein a synchronous request is handled on a first-in-first-out basis, and wherein an asynchronous request is processed and a response returned in accordance with a processing time of the request; .

wherein said stateless module manager routes said request to an appropriate information module for resolution, and wherein said appropriate information module resolves said request and returns a response to said stateless module manager;

wherein said stateless module manager maintains a list of supported services provided by each of said information modules and handles service collisions such that if plural information modules register as supporting a same service by determining which of said plural information modules will handle said request;

wherein instances of said stateless module manger are created each time a new request is received and discarded after the request has been handled;

wherein said stateless module loading function includes local and remote module loading functions, wherein said local loading function loads information modules that reside on a same physical device as said stateless module manager, wherein said remote loading function loads information modules that reside on devices logically connected to said stateless module manager, wherein said local modules communicate with said stateless module manager via one of memory calls, object inheritance, and inter-process communication, and wherein said remote information modules communicate with said stateless module manager via TCP/IP sockets; and

further comprising a user interface, wherein said user interface is adapted to configure said stateless module manager."

In making out a rejection of this claim, the Office states that Feit teaches a stateless module manager that manages requests for information received at a

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mailbox. The Office further cites Strahm and Rubert as teaching other elements of the claim, before the Office states that it would have been obvious to combine the references. Applicant respectfully disagrees.

As discussed above in regards to the rejection of claims 1 and 3, Feit does not teach or suggest a stateless module manager that manages "requests for *electronic* information", as recited in Applicant's claim 22. (emphasis added). Instead, Feit teaches away from this claim, by describing a system where a client may use the internet to request *physical products*, such as magazines. Furthermore, Strahm and Rubert do not teach this element, nor are they cited as doing so.

Claim 22 is also amended as indicated above to incorporate features formerly recited severally in dependent claims 25-31. These dependent claims 25-31 are thus cancelled. However, the Applicant comments below on the art applied to these dependent claims 25-31, and for convenience, references the art as applied to each claim 25-31 as it formerly stood.

Therefore, for at least the reasons given above with respect to claims 1 and 3, the rejection of claim 22 is improper. Applicant respectfully requests that the rejection be withdrawn.

Dependent claims 30 and 31 formerly depended from claim 22 and, by virtue of this dependency, the above comments directed to claim 22 apply equally to these claims. Moreover, these claims recited features that, when taken together with those of claim 22, defined devices not taught or suggested by the cited references.

Feit in view of Rubert in further view of Strahm in further view of Langseth

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Claims 25-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Rubert in further view of Strahm in further view of Langseth. Applicant respectfully traverses the rejection.

In making out a rejection of these claims, the Office relies upon the rejection of the base claim 22 as described above. Neither Rubert, Strahm, nor Langseth teach or suggest the deficiencies of the rejection in relation to base claim 22, nor are they cited by the Office as doing so. Therefore, the addition of these references is not seen to add anything of substance to the rejection of the base claim.

Dependent claims 25-27 formerly depended from claim 22 and, by virtue of this dependency, the above comments directed to claim 22 applies equally to these claims. Moreover, these claims recited features that, when taken together with those of claim 22, defined devices not taught or suggested by the cited references.

Feit in view of Hunt in further view of Bavadekar

Claims 4, 14 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Hunt in further view of U.S. Patent Publication No. 2003/0009571 to Bavadekar (hereinafter, "Bavadekar"). Applicant respectfully traverses the rejection.

In making out a rejection of these claims, the Office relies upon the rejection of the base claims as described above. Neither Hunt nor Bavadekart teach or suggest the deficiencies of the rejection in relation to base claims 1, 12 and 17, nor are they cited by the Office as doing so. Therefore, the addition of

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these references is not seen to add anything of substance to the rejection of these base claims.

Dependent claims 4, 14 and 19 depend from claims 1. 12 and 17 and, by virtue of this dependency, the above comments directed to claims 1, 12 and 17 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claims 1, 12 and 17, define devices and methods not taught or suggested by the cited references.

Feit in view or Rubert in further view of Strahm in further view of Hunt in further view of Bavadekar

Claims 28 and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Rubert in further view of Strahm in further view of Hunt in further view of Bavadekar. Applicant respectfully traverses the rejection.

In making out a rejection of these claims, the Office relies upon the rejection of the base claim as described above. None of Rubert, Strahm, Hunt or Bavadekar teach or suggest the deficiencies of the rejection in relation to base claim 22, nor are any of these references cited by the Office as doing so. Therefore, the addition of these references is not seen to add anything of substance to the rejection of the base claim.

Dependent claims 28 and 29 formerly depended from claims 22 and, by virtue of this dependency, the above comments directed to claims 22 apply equally to these claims. Moreover, these claims recited features that, when taken together with those of claim 22, defined devices not taught or suggested by the cited references.

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Conclusion

Applicant respectfully requests reconsideration and withdrawal of the rejections of claims 1-22 and 25-31, and favorable action on the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Date: 25 NOV 05

By: _____
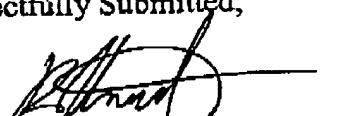
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